

# **EXHIBIT 4**

THE HONORABLE BARBARA J. ROTHSTEIN

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PARLER LLC,

Plaintiff,

v.

AMAZON WEB SERVICES, INC.,

Defendant.

No. 2:21-cv-00031-BJR

JOINT STIPULATION AND  
[PROPOSED] ORDER FOR  
AMENDMENT AND RESPONSE  
SCHEDULE

**NOTE ON MOTION CALENDAR:  
February 16, 2021**

**JOINT STIPULATION**

Pursuant to the Court's Standing Order (Dkt. 35), and the Joint Stipulation and the Court's Order dated January 28, 2021 (Dkt. 38), the Parties submit the following stipulation:

1. The deadline for Plaintiff Parler LLC ("Parler") to file its Amended Complaint is February 16, 2021.
2. The deadline for Defendant Amazon Web Services, Inc. ("AWS") to respond to Plaintiff Parler's Amended Complaint is March 22, 2021.

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3. Counsel for Parler represents that on or about Saturday, February 13, 2021, Parler engaged the legal services of Mr. Angelo J. Calfo of the Calfo Eakes LLP law firm. In sum, Parler believes that it and Mr. Calfo need an extension of time for Mr. Calfo to review the pleadings and to be prepared to assist Parler and its current counsel with the filing of the Amended Complaint.
4. Moreover, counsel for Parler represents that Parler has been working to pursue its working model to get back online; that Parler was able to get back online beginning on February 15, 2021; and Parler believes that this factual development, which occurred just one day before the current deadline to file the Amended Complaint, will have a material impact on how Parler pleads the Amended Complaint.
5. Counsel for Parler is familiar with the Court's Standing Order (Dkt. 35), which requires extensions of time be requested three days in advance. However, Parler's counsel believes that good cause exists to adjust the scheduling of the aforementioned pleadings and that the administration of justice will be served thereby.
6. AWS does not oppose Parler's request for additional time.
7. On January 25, 2021, the Court entered an Order setting Initial Scheduling Dates.
8. The parties agree that upcoming deadlines should be revised, as set forth below.
  - a. Parler will file an Amended Complaint no later than March 2, 2021;
  - b. AWS's deadline to respond to Parler's Amended Complaint will be April 8, 2021;
  - c. Deadline for FRCP 26(f) conference: May 21, 2021
  - d. Initial Disclosures: May 28, 2021



e. Joint Status Report and Discovery Plan: June 4, 2021

9. The parties respectfully request that the Court memorialize these revised deadlines by entering the proposed order accompanying this stipulation.

Dated this 15<sup>th</sup> day of February, 2021.

Respectfully submitted,

DAVID J. GROESBECK, P.S.

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*Counsel for Amazon Web Services, Inc.*



**ORDER**

Pursuant to the stipulation, IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE

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